UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

WILLIAM NORKUNAS, Individually,

Plaintiff,

Case No. 3:11-cv-00281

VS.

JUDGE KEVIN H. SHARP

RNA, LLC, a Tennessee Limited Liability Company,

MAGISTRATE JULIET E. GRIFFIN

Defendant.

JOINT INITIAL CASE MANAGEMENT PLAN AND ORDER

Pursuant to Fed. R. Civ. P. 16 and 26(f), the parties submit the following joint statement:

- 1. Matters Discussed by Parties. The parties discussed the following issues:
 - a. A proposed pre-trial schedule for the case that includes the plan for discovery and deadlines;
 - Anticipated dispositive and pre-trial motions;
 - c. Alternative dispute resolution; and
 - d. Settlement.
- 2. Procedural Motions and other Pending Matters. There are no pending motions currently before the Court.

Case No.: 3:11-cv-00281

3

01

3.	Schedule for Discovery.	The parties have agreed on the following case schedule:	
n.+		A greed Deadline	

Event	Agreed Deadline
Fed.R.Civ.P. 26(a)(A)-(D) disclosures	August 7, 2011 August 9, 2011 with supplements taken
	as necessary
Plaintiff's expert reports (Fed.R.Civ.P. 26(a)(2)	October 15, 2011
Motions to add parties or amend pleadings	October 24, 2011
Defendant's expert reports (Fed.R.Civ.P. 26(a)(2)	December 16, 2011
Close of discovery (except expert discovery)	December 16, 2011
Summary judgment motions must be filed by	January 30, 2012
Close of expert discovery	January 30, 2012
All other motions; excluding motions in limine	February 15, 2012

- 4. **Discovery Limits.** The parties have agreed that all discovery requests must be propounded no later than 33 days prior to the close of discovery. Each party shall reserve its or his right to seek by motion additional discovery, with good cause shown.
- 5. Settlement. The parties have agreed that settlement is likely, but do not at this time request a settlement conference before a Magistrate Judge.
 - 6. Trial by Magistrate Judge. The parties consent to trial by a Magistrate Judge.
- 7. **Modification of Schedule**. All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion of the Court for good cause shown.

Respectfully submitted,	
COUNSEL FOR PLAINTIFF:	COUNSEL FOR DEFENDANT:
/s/Lawrence A. Fuller Lawrence A. Fuller, Esq., pro hac vice FULLER, FULLER & ASSOCIATES, P.A. 12000 Biscayne Blvd., Suite 609 North Miami, FL 33181 Telephone: (305) 891-5199 Facsimile: (305) 893-9505 Ifuller@fullerfuller.com	/s/Mark A. Nobles Mark A. Nobles, Esq., TN Bar NOBLES LAW GROUP, PLLC 611 N. Maple Street Murfreesboro, TN 37130 Telephone: (615) 907-8464 Facsimile: (615) 250-4819 mark@nlgpllc.com
and Jonathan A. Street, Esq., TN Bar 021712 HIGGINS, HIMMELBERG AND PILIPONIS 116 Third Avenue, South Nashville, TN 37201 Telephone: (615) 353-0930 Facsimile: (615) 216-8372 street@hhpfirm.com	
SO ORDERED, this day of	, 2011, in Nashville, Tennessee.

UNITED STATES MAGISTRAPE JUDGE JULIET E GRIFFIN